

U.S. V. Hamza Naj Ahmed

COUNT 2

(Attempting to Provide Material Support to
a Designated Foreign Terrorist Organization)

On or about November 8, 2014, within the State and District of Minnesota, and
elsewhere, the defendant,

HAMZA NAJ AHMED,

did knowingly and intentionally attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), namely personnel, to a foreign terrorist organization, namely the Islamic State in Iraq and the Levant, which the Secretary of State has designated as a foreign terrorist organization since on or about May 15, 2014, knowing that the organization was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), and knowing that the organization has engaged and was engaging in terrorist activity and terrorism; all in violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT 3

(False Statement)

On or about November 8, 2014, within the State and District of Minnesota, and elsewhere, in a matter within the jurisdiction of the Federal Bureau of Investigation ("FBI"), an agency of the United States, and in an offense involving international terrorism, the defendant,

HAMZA NAJ AHMED,

did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation to agents of the FBI, in violation of Title 18, United States Code, Section 1001(a)(2), that is, the defendant stated (1) that he did not know an individual named M.F.,

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(2) that he was traveling alone, and (3) he was traveling from Minneapolis to Madrid, Spain for vacation, when in fact, the defendant knew the person M.F. and was traveling with M.F. and others to Syria.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON